

# UNITED STATES DISTRICT COURT

for the

United States Courts  
Southern District of Texas  
FILED

OCT 26 2011

David J. Bradley, Clerk of Court

LYNDON GRANGER, ULYSSES  
GRANGER, BARTHOLOMEW  
GRANGER SR,  
BARTHOLOMEW GRANGER JR  
Plaintiff,

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v.

Civil Action No. 4:10-cv-02698

CITY OF HOUSTON  
Defendants.

## MOTION TO OPPOSE CITY OF HOUSTON'S SUMMARY JUDGMENT AND DISMISSAL

TO THE HONORABLE JUDGE NANCY F.ATLAS:

Comes now, Plaintiffs, LYNDON GRANGER, Bartholomew Granger SR,  
Bartholomew Granger JR, Ulysses Granger, and complains of:

### AFFIDAVIT

**Give us Liberty or give us DEATH!.** We all seek justice for the problems that were caused by the Houston police department. We have stated our case and we also made a jury demand. We are the victims of this avalanche of law enforcement mistakes, mishaps, harassment, physiological and psychical abuse. Also the unlawful pursuit of our family over lies. Before anyone had put their hands on anyone of the plaintiffs we have rights under the constitution and the law to have protection against false accusation, false imprisonment and false arrest. **We did nothing wrong**, we lost money and to this date is still suffering from this entire debacle. Our lives were flipped upside down and everyone in that summary Houston wrote is responsible for damages. But right now this case is about the wrong concerning the City of Houston. Houston attorney was given more proof by the Grangers during the deposition. She chose to only pick and choose what she deem necessary to look as less liable as possible. But the fact still remains we suffered, not Houston's Defense attorney Kelly Dempsey.

We started this case as a pauper, and our finances are still compromised. But **by law we the plaintiffs has a right to a fair trial.** We cannot afford a trial so the plaintiffs would like to request that **the defendant tender the cost of a trial.** the reason we are in court is because of their officers abuse and bad judgments caused our distress and loss. By law they are obligated to pay it. Look at the summary report from Houston, you can see that everything that was done, we did not ask for that interruption in our lives. Have these police and officers in these reports ever heard of evidence. None was present or presented no proper investigation was done. Our rights were not protected. Does the law only punishes black men?. Does the law even protect Black men in any way?. It feels like society has declared war on us for no reason without cause or justification.

We are being trampled on by every Fawcett of law enforcement. If we make mistakes we go to jail, but when the counties, police and cities make mistakes they walk free. No consequence for violating our bodies freedom or minds. I'm asking you as a judge and a person to give us the protection we deserve under the law, against this travesty!. Imagine if you are your family had to endure this horrible nightmare as a minority in this bias system.

**A pre summary judgment is prejudice and unfair. We have suffered multiple catastrophic losses. They tried to falsely imprison us, CPS stole our kids. now Houston wants to take our freedoms and rights, right here in federal court. Asking you to push us to the side, we are human and we have lives too. Do what's right in the eyes of God!.**

For all the laws we the plaintiffs did not quote to the US District Court under the 9th amendment we are protected and they all apply in this case. We the plaintiffs demand equal protection under the law and request that all laws and rules apply and be followed in this case until judgment is made.

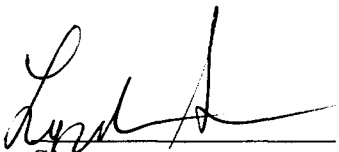
**We have eye witness and hospital repots on the abuse from the Houston police. Also they failed to show the report on the visit HPD came out on Jan 8, 2010 @ 633 Rush creek. they want to cover it up. All the plaintiffs and our family members went in and gave Kelly Dempsey ample proof and testimony on the facts concerning the case. Also I gave her an in-depth perspective on the family villains who aided in setting us up. See Exhibit A.**

The City of Houston failed to  
protect it's citizens from total  
corruption. <sup>Page 2</sup> 10-24-2011

For all the laws we the plaintiffs did not quote to the US District Court under the 9th amendment we are protected and they all apply in this case. We the plaintiffs demand equal protection under the law and request that all laws and rules apply and be followed in this case until judgment is made.

Respectfully Submitted,

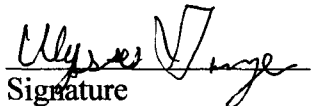
**LYNDON GRANGER**  
**BARTHOLOMEW GRANGER SR**  
**BARTHOLOMEW GRANGER JR**  
**ULYSSES GRANGER**  
P.O. Box 550661  
Houston, Texas 77255  
(713) 260-7754

  
Signature

10-24-11  
Date

  
Signature

10-24-11  
Date

  
Signature

10/24/2011  
Date

  
Signature

10-24-11  
Date

Exhibit A

## **Outline of Deposition**

### **Case and Points:**

This package was put together to show the Defendant **City of Houston and law enforcement**, the problems and issues that were caused by a gang of rogue ghetto street Friends and Family members. This file will connect the dots so that everyone including law enforcement, can see how this unlawful conspiracy took place. Which has damage the Granger Family financially and Psychologically. these rogues has caused law enforcement to waste man power and tax dollars on fraudulent leads, also the city of Houston has to endure a civil case due to this malicious plot.

We have listed the players in this crime wave and what their role was in this travesty. There is a facebook connection amongst all of the criminals. And a joint collaboration to deceive the government for money and use the laws unlawfully for financial gain.

What you have in this case is: An attempted Murder, An attempt to cause false imprisonment, and an elaborate low level Kidnapping ring. Devised to steal our children and make money while doing it. There are some criminal elements in the higher offices of law enforcement and in The Texas Department of Family Protective Services. Even the juvenile judge has a dirty hand in this unlawful taking of our children. We were faced with false indictments, false police reports bad county agents and corrupt lawyers. Our whole family is innocent and we were wrongly attacked over malicious lies. Many people violated our civil rights. **We want the common criminals that violated us to be arrested.** as to the **higher official corruption** and their many agents, we have filed with **Federal court** and the **Department of justice**. To make these people pay for the total violation of our law bidding family and the roles they played.

### **This report will include:**

Our where about before and during and after these false allegations. Proof of address, where we were working. Evidence of foul play on every person named. Letter recorded message, documents and hospital reports, witness statements and proof that all of the criminals failed to appear in state criminal and federal court. Proof and pictures of the threats before and after the kidnapping. Crime watch report and the names and number of the US Marshals that descended on our home.

Exhibit A-2

**List of people that were involved in this Conspiracy  
And their role:**

**Names:**

1.Claudia Jackson 2.Eric B Jackson  
3.Patrick Lyndell Atkins, 4.Vallire Nicole Atkins aka Vallire Granger  
5.Amber Jernigan, 6.Rebecca D. Richards  
7.Wanda Miles, 8.Clifstina Franks  
9.Tameka Taylor, 10.Samantha Granger

**Roles:**

**Claudia Jackson**– She organized the attempted murder of my mother, she had a fifteen year old grudge on Vallire Ozone and The Granger Family. also She put her daughter up to filling the false reports in Houston Texas and Beaumont Texas. She also is a felon that did time for welfare fraud. She told lies to a federal Judge. She also owed 6 years back child support. She called Barthomelwe Granger earlier 2009 and tried to bribe him out of the tax money that child support gave him. Race: Black, Female mid 30's

**Eric B Jackson**– He was one of the persons that my mother saw as she was assaulted. he help Patrick Atkins beat Vallire Ozone down. He is an ex-con with a murder record in Louisiana. He was recruited by Claudia Jackson to kill vallire ozone. Race: Black Male early 40's

**Patrick Lyndell Atkins**– Was the head of the attack and assault on vallire ozone. He had a bad past and a drinking habit that vallire ozone did not approve of.

**Vallire Nicole Atkins aka Vallire Granger**– Gave the killers the address to where my mother live and the time to jack her. She also held a grudge against my mother for not accepting her drunken boyfriend. She also agreed to testify as a witness to these false allegations of rape. She was attending college durning all of these false allegation so called times.

**Amber Jernigan**– She lied to CPS and to Houston police in order to help the other criminals cause false arrest and to aide in kidnapping our children Samara Jernigan and Trinity Jernigan. She tried to commit suicide before and after she had the baby. She gave her child away and ran away She was facing three years back child support. So she contacted Samantha and Claudia Jackson to put together and orchestrate these lies.

Exhibit A-3

Cont:

**Rebecca D. Richards**– This lady went along with the lies, she caused Barthlomew Granger harm by writing checks in his name.

**Wanda Miles**– She used Trinity Jernigan illegally on her tax return. She also lied to CPS to get Trinity Jernigan away from Latoya Jernigan. When the child was taken from Wanda Miles by CPS, she got her fellow comrade church member, Tameka Taylor to adopt Trinity. She has a bad past history with CPS.

**Clifstina Franks**– She also allocated lies for Amber and Wanda miles to help them in aiding in the kidnapping of Trinity Jernigan She's a drug user seller dealer and prostitute.

**Tameka Taylor**– This women is a social worker that knew Wanda miles and got together to push a force adoption through CPS illegally. She at present is holding my daughter Trinity Jernigan. against her will

**Samantha Granger**– She is the puppet and the pawn that Claudia Jackson and Vallire Nicole Granger brained washed into running with these false allegations.

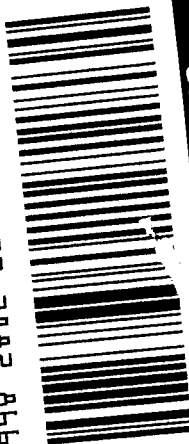
**Note:**

Most of these assailants has criminal background and or use drugs. These low life ghetto trash thought they could out smart law enforcement and the state. They lied and bribed local and state officials to get the results they wanted. But we cannot be fooled by people with a total combined IQ of a negative -15. these people ruined our lives and our children's life. No one should have to live with this nightmare. I also left a voice recording on a jump drive of Claudia voice and a copy of a federal case we filed earlier. you can see how she failed to come to court and lied to a federal judge. Making more slanderous lies to a US district court, these people have not been around us from 3 to 12 years and they did not know who they were playing with. We are smart law bidding people and they hated that. so they set out to ruin our lives because we did not want to have nothing to do with them. A bunch of Black people using the police to Beat us and using the state of Texas to collect government money based on adoption. The lady Tameka needs to keep up her house payments by using our children for profit. We want this hell to end. We want to file formal charges of attempted murder, false incarceration and Kidnapping. We have provided proof to everything stated.

Lyndon Granger  
P.O. Box 550661  
Houston, Texas 77255

United States District Court  
Southern District of Texas  
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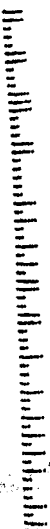
**CERTIFIED MAIL**



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US Southern District Court

515 Rusk Street  
Room 5300  
Houston, TX 77002-2623

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U.S. POSTAGE  
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**\$5.79**

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RETURN RECEIPT  
REQUESTED